

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

| | | |
|---|---|--------------------|
| AMEREN TRANSMISSION COMPANY OF ILLINOIS |) | |
| |) | |
| Petition for a Certificate of Public Convenience and |) | |
| Necessity, pursuant to Section 8-406.1 of the Illinois Public |) | |
| Utilities Act, and an Order pursuant to Section 8-503 of the |) | |
| Public Utilities Act, to Construct, Operate and Maintain a |) | Docket No. 12-0598 |
| New High Voltage Electric Service Line and Related |) | |
| Facilities in the Counties of Adams, Brown, Cass, |) | |
| Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon, |) | |
| Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, |) | |
| Scott and Shelby, Illinois. |) | |

**JOINT MOTION TO FILE AND ADMIT A STIPULATION BETWEEN
AMEREN TRANSMISSION COMPANY OF ILLINOIS AND THE MORGAN AND
SANGAMON COUNTIES LANDOWNERS AND TENANT FARMERS**

Ameren Transmission Company of Illinois (ATXI), along with the Morgan and Sangamon Counties Landowners and Tenant Farmers (MSCLTF) (together, Stipulating Parties), hereby move for admission into the record in this case the attached Stipulation, marked as Stipulation Exhibit 1. In support of this motion, Petitioners states as follows:

1. ATXI filed an application in this matter on November 7, 2012 seeking issuance by the Illinois Commerce Commission (Commission) of a Certificate of Public Convenience and Necessity pursuant to Sections 8-406.1 and 8-503 of the Public Utilities Act, 220 ILCS 5/8-406.1, 8-503, authorizing ATXI to construct, operate, and maintain a new electric Transmission Line (as defined in the Petition) and related facilities (collectively, the Project) in areas of the State of Illinois.

2. ATXI proposed a Primary and Alternate Route for each section of the Project, including the portion of the route between Meredosia and Pawnee, Illinois.

3. The Administrative Law Judges (ALJs) granted MSCLTF's Petition to Intervene on December 3, 2012 and its Amended Petition to Intervene on December 20, 2012.

4. MSCLTF filed an Identification of Alternate Route on December 31, 2012, in which it voiced opposition to ATXI's Primary Route and stated a preference for ATXI's Alternate Route "as depicted in ATXI Petition Exhibit A (part 3 of 5)," for the portion of the project between Meredosia and Pawnee, Illinois.

5. The Stipulating Parties have engaged in discussions regarding resolution of certain concerns that have been raised by MSCLTF in this proceeding with respect to the proposed Transmission Line route between Meredosia and Pawnee, Illinois. As a result of the discussions, an agreement was reached between the Stipulating Parties resolving these concerns. This agreement is reflected in Stipulation Exhibit 1. Under the terms of the agreement, the Stipulating Parties, *inter alia*, support and recommend the Commission's approval of the ATXI's Alternate Route as depicted in ATXI Petition Exhibit A (part 3 of 5) (the Stipulated Route – Meredosia to Pawnee).

6. The Stipulating Parties agree that there is support in the record for the adoption of the Stipulated Route – Meredosia to Pawnee.

7. ATXI will further address the basis for its support for the Stipulated Route – Meredosia to Pawnee in its forthcoming Rebuttal Testimony.

8. The filing of Stipulation Exhibit 1 will ensure a full, complete and accurate record in this proceeding, supports the Commission policy of encouraging settlement, and will serve the interests of administrative efficiency in that issues otherwise in dispute are resolved by the agreement reflected in Stipulation Exhibit 1.

9. The MSCLTF have reviewed this motion and are in agreement with it.

WHEREFORE, for the above reasons, Stipulating Parties request admission of Stipulation Exhibit 1 into the evidentiary record in this case.

Dated: March 13, 2013

Respectfully submitted,

Ameren Transmission Company of Illinois

/s/ Albert Sturtevant

Edward C. Fitzhenry
Matthew R. Tomc
Eric E. Dearmont
AMEREN SERVICES COMPANY
One Ameren Plaza
1901 Chouteau Avenue
Saint Louis, Missouri 63166
(314) 554-3533
(314) 554-4014 (fax)
efitzhenry@ameren.com
mtomc@ameren.com
edearmont@ameren.com

Albert D. Sturtevant
Anne M. Zehr
Rebecca L. Segal
Hanna M. Conger
WHITT STURTEVANT LLP
180 North LaSalle Street, Suite 2001
Chicago, Illinois 60601
(312) 251-3017
sturtevant@whitt-sturtevant.com
zehr@whitt-sturtevant.com
segal@whitt-sturtevant.com
conger@whitt-sturtevant.com

Mark A. Whitt
Shannon K. Rust
WHITT STURTEVANT LLP
88 East Broad Street, Suite 1590
Columbus, Ohio 43215
whitt@whitt-sturtevant.com
rust@whitt-sturtevant.com

Respectfully submitted,

Morgan and Sangamon County Landowners
and Tenant Farmers

A handwritten signature in cursive script, appearing to read "Brad Wilson", written in black ink.

Bradley B. Wilson
Gates, Wise & Schlosser, P.C.
1231 S. Eighth Street
Springfield, IL 62703
brad@gwspc.com

CERTIFICATE OF SERVICE

I, Albert Sturtevant, an attorney, certify that on March 13, 2013, I caused a copy of the foregoing *Motion for Leave to File Stipulation* to be served by electronic mail to the individuals on the Commission's Service List for Docket 12-0598.

/s/ Albert Sturtevant

Attorney for Ameren Transmission
Company of Illinois


VERIFICATION

I, Albert D. Sturtevant, certify that: i) I am an attorney for Ameren Transmission Company of Illinois; ii) I have read the foregoing *Motion*; iii) I am familiar with the facts stated therein; and iv) the facts are true to the best of my knowledge, information and belief.


Albert D. Sturtevant

STATE OF ILLINOIS)
) SS
CITY OF CHICAGO)

Subscribed and SWORN to before me this 13th day of March 2013.


Notary Public

